

FORM TO BE USED BY A PRISONER FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CALVIN HEMPHILL *404753

550 E. MADISON ST.

BALTIMORE, MD 21202

(Full name, prison identification
number and address of the plaintiff)

v.

Civil Action No. WDQ 12-2266
(Leave blank. To be filled in by Court.)

SHAVELLA MILES et al.

BALTIMORE CITY DETENTION CENTER

401 E. EAGER ST.

BALTIMORE, MD 21202

(Full name and address of the defendant(s))

COMPLAINT

I. Previous lawsuits

A. Have you filed other cases in state or federal court dealing with the same facts as in this case or against the same defendants?

YES [] NO [X]

B. If you answered YES, describe that case(s) in the spaces below.

1. Parties to the other case(s):

Plaintiff: _____

FILED
LOGGED
ENTERED
RECEIVED
JUL 31 2012
CLERK, AT BALTIMORE
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

Defendant(s): _____

2. Court (if a federal court name the district; if a state court name the city or county): _____

3. Case No.: _____

4. Date filed: _____

5. Name of judge that handled the case: _____

6. Disposition (won, dismissed, still pending, on appeal): _____

7. Date of disposition: _____

II. Administrative proceedings

A. If you are in a Division of Correction facility, did you file an administrative remedy procedure request under DCD 185-001, et seq.?

YES [] NO []

1. If you answered YES:

a. What was the result? SEE ATTACHED ARP

b. Did you appeal to the Commissioner?

YES [] NO []

2. If you answered NO to either of the questions above, explain why you did not file an administrative remedy procedure request or an appeal to the

Commissioner. I AM A PRE-TRIAL DETAINEE HOUSED
IN A D.C. FACILITY FOR SAFETY PURPOSES

3. Did you file any other type of administrative complaint such as an appeal to the warden of an adjustment decision or a decision to withhold mail, a complaint to the Sundry Claims Board, etc.?

YES ☐ NO ☐

4. If you answered YES, explain what you filed and what was the result.

- B. If you are not in a Division of Correction facility, is there a grievance procedure at your institution?

YES ☒ NO ☐

If your answer is YES:

1. Did you file a grievance?

YES ☒ NO ☐

2. If you filed a grievance what was the result? I DIDN'T RECEIVE

A RESPONSE

3. If you did not file a grievance explain why not? _____

CASE NO.

MR000-059212

JUL 02 2012

MARYLAND DIVISION OF CORRECTION
REQUEST FOR ADMINISTRATIVE REMEDY
 (Instructions for completing this form are on the back)

TO: ☒ Warden of InstitutionEmergency Request: ☐ Check only if your complaint poses a continued threat to your health, safety, or welfare.

FROM: HEMPHILL CALVIN 404753 MR000
 Last Name First Name Middle Initial DOC Number Institution
 Housing Location 7212 Protective Custody ☐ Administrative Segregation ☒ Disciplinary Segregation ☐

Part A - INMATE REQUEST

ON 6-2-12 I WAS ASSAULTED BY NUMEROUS C.O.'S AT BDOC WHILE I WAS HANDCUFFED. AMONGST THOSE WHO ASSAULTED ME WERE SGT. M. PORTER, CAPT. HUTCHINS OR HICKSON (I THINK HIS NAME WAS HICKSON), AND NUMEROUS FEMALE C.O.'S (I THINK THEY WERE EVANS TUCKER AND PALMER). I SUSTAINED SEVERAL INJURIES FROM THIS ATTACK AND I ASKED THAT CHARGES BE BROUGHT AGAINST THE OFFICERS. I WAS TOLD THEY WERE INVESTIGATING THE ASSAULT,

6-28-12

Date

Calvin Hemphill

Signature of Inmate

Part B - RESPONSE

Date

Signature of Warden

You may appeal this response by following the procedure prescribed on the back of this form.

Part C - RECEIPT

RETURN TO: Hemphill Calvin
 Last Name First Name Middle Initial

404753
DOC Number

Case No.

MR000-059212

MR000
InstitutionI acknowledge receipt of your complaint dated 6/28/12 in regard to:

BDOC has been dismissed due to procedural reasons.
According to DCD 185-002, Section 2 the ARP process is
applicable to D.O.C inmates who are housed in a D.O.C facility. You
are not a D.O.C inmate. Therefore you cannot utilize
the ARP process under this directive.
Please write BDOC Insurance Office.

Institutional ARP Coordinator

Original: White - Institutional ARP Coordinator

Copy: Canary - Inmate

DOC Form 185-002c (Rev. 7/08)

JUL 02 2012

MRDCC-0592-12

Part A (Continued) - INMATE REQUEST

BUT CHARGES HAVE YET TO BE FILED. SINCE THEN I'VE MAILED 2 GRIEVANCE FORMS TO BODE, TO WHICH I HAVE YET TO RECEIVE A RESPONSE. I REALIZE THERE'S NOT MUCH MRDCC CAN DO; I JUST DON'T WANT THESE OFFICERS TO GET AWAY WITH ASSAULTING ME.

6-28-12

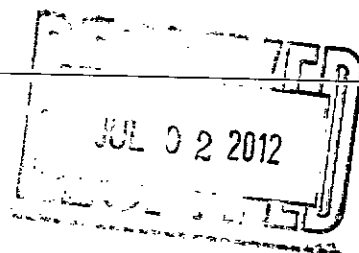
Date

CALVIN HEMPHILL *Calvin Hemphill* 404753

Inmate's Name: Print and Signature

DOC #

JUL 02 2012



COMPLAINT

1.) ON JUNE 2, 2012, I ASSAULTED CORRECTIONAL OFFICER KWANITA WEST (HEREAFTER C.O. II WEST) BECAUSE SHE PRETENDED TO BE MY FRIEND IN ORDER TO SOLICIT INFORMATION ABOUT THE BLACK GUERRILLA FAMILY (BGF) - A PRISON GANG OF WHICH I AM A FORMER MEMBER. AT THE TIME, I DIDN'T THINK NOTHING OF TALKING TO HER BECAUSE OF HER ASSOCIATION WITH THE GANG AND IT'S LEADER, TAVON WHITE. PLUS, SHE SWORE SHE WOULD NEVER SAY NOTHING, AND IF ASKED, SHE WOULD SAY WE WERE TALKING ABOUT HER. HOWEVER, WHEN TAVON ASKED HER WHAT WE TALK ABOUT, SHE TOLD HIM I TELL HER BGF BUSINESS AND WHAT CORRECTIONAL OFFICERS HE IS HAVING SEX WITH.

2.) TAVON CALLS ME TO THE AREA BETWEEN THE TIER GRILLE AND THE SECTION DOORWAY ON F-SECTION, AND CONFRONTS ME WITH WHAT C.O. II WEST JUST TOLD HIM. SOME OF IT I DENY AND SOME I OWN UP TO. (HE HAS WITH HIM FIVE MEMBERS OF THE BGF AND C.O. II WEST IS SITTING IN A CHAIR IN THE DOORWAY). HE TURNS TO C.O. II WEST AND ASKS HER AM I LYING. C.O. II WEST GETS UP AND WALKS INTO THE HALLWAY, WHERE TAVON FOLLOWS HER. UPON HIS RETURN TO THE AREA, TAVON WHISPERS IN A BGF MEMBER EAR (HE QUICKLY LEAVES) THEN TURNS AND SCREAMS AT ME "HOW SHE KNOW I CALLED "R" THE OTHER DAY, HUH? HOW SHE KNOW?" (C.O. II WEST KNEW TAVON AND I HAD CLASHED BEFORE HER VACATION, BUT UPON HER RETURN TO WORK WE WERE ON SPEAKING TERMS. SHE ASKED ME HOW DID WE GET COOL AND I TOLD HER TAVON CALLED SOMEONE ON THE STREETS SEEKING TO HARM ME AND THEY TOLD HIM TO LEAVE ME ALONE).

3.) BY THE TIME TAVON FINISHES HIS TIRADE, THE DEPARTED BGF MEMBER HAS RETURNED AND HANDS TAVON HIS CELL PHONE. TAVON ORDERS EVERYONE UPSTAIRS. ONCE EVERYONE IS UPSTAIRS, HE CALLS SOME MORE BGF MEMBERS

RELIEF SOUGHT

- 1) SHAVELLA MILES - ^{\$}10,000.00 IN PUNITIVE DAMAGES
- 2) CAPTAIN MANCOCK - ^{\$}500.00 IN COMPENSATORY DAMAGES FOR INJURIES I'VE SUFFERED FROM BEING ASSAULTED; ^{\$}4,500.00 IN PUNITIVE DAMAGES
- 3) SARGENT PORTER - ^{\$}2,250.00 IN COMPENSATORY DAMAGES FOR INJURIES I'VE SUFFERED FROM BEING ASSAULTED; ^{\$}8,000.00 IN PUNITIVE DAMAGES
- 4) KWANITA WEST - ^{\$}10,000.00 IN PUNITIVE DAMAGES
- 5) TERON KNIGHT - ^{\$}3,500.00 IN PUNITIVE DAMAGES
- 6) JANE DOE #1 (C.O. II TUCKER) - ^{\$}3,725.00 IN COMPENSATORY DAMAGES FOR INJURIES I'VE SUFFERED FROM BEING ASSAULTED; ^{\$}7,500.00 IN PUNITIVE DAMAGES
- 7) JANE DOE #2 (C.O. II EVANS) - ^{\$}3,725.00 IN COMPENSATORY DAMAGES FOR INJURIES I'VE SUFFERED FROM BEING ASSAULTED; ^{\$}7,500.00 IN PUNITIVE DAMAGES
- 8) JANE DOE #3 - ^{\$}3,725.00 IN COMPENSATORY DAMAGES FOR INJURIES I'VE SUFFERED FROM BEING ASSAULTED; ^{\$}7,500.00 IN PUNITIVE DAMAGES
- 9) JOHN DOE #1 - ^{\$}3,725.00 IN COMPENSATORY DAMAGES FOR INJURIES I'VE SUFFERED FROM BEING ASSAULTED; ^{\$}7,500.00 IN PUNITIVE DAMAGES
- 10) ATTORNEY FEES AND ANY COSTS ASSOCIATED WITH FILING THIS

WHO WERE ON THE EAST TOP TIER AND ORDERS THEM TO BOX ME IN AS HE DIALS A NUMBER (C.O. II WEST IS STANDING AT THE TOP OF THE STEPS WATCHING). HE SHOWS ME THE SCREEN OF THE PHONE TO ASSURE ME OF WHO HE'S CALLING AND ASKS ME DO I WANT HIM TO TELL "R" WHAT I DID OR HER (WEST). I'M LIKE IT REALLY DOESN'T MATTER BECAUSE I LOSE ANYWAY.

4) TAVON WALKS TO A CORNER AND HOLDS AN UNHEARD CONVERSATION WITH "R". AFTER HE HANGS UP THE PHONE, TAVON WALKED TOWARD ME AND AGGRESSIVELY SAYS "YOU A BITCH; A REAL BITCH ASS NIGGER", WHILE POINTING HIS FINGER AT MY FACE. C.O. II WEST STEPS BETWEEN US AND ASKED TAVON NOT TO DO ANYTHING TO ME. TAVON THEN STATED, "R" SAID TO LEAVE YOU ALONE FOR NOW BECAUSE YOU'RE MOTHER KNOWS WHAT'S GOING ON, AND IF SOMETHING HAPPENS TO YOU NOW SHE MIGHT TELL. BUT YOUR WORKING MAN JOB IS GONE AND YOU'RE MOVING OUT OF THAT CELL. YOU CAN CONTINUE DOING WHAT YOU WERE DOING FOR TODAY." C.O. II WEST, TAVON AND EVERYONE ELSE THEN WENT DOWNSTAIRS.

5) I BECAME WORRIED THAT EVERYTHING THAT JUST HAPPENED WAS A FRONT FOR C.O. II WEST SO SHE WOULDN'T TELL WHEN I GOT HIT, BECAUSE I KNOW MY MOTHER DID NOT KNOW WHAT WAS GOING ON. SO I WENT AND GOT MY KNIFE, AND TRIED TO THINK OF A WAY OUT OF THIS PREDICAMENT. I ASKED C.O. II WEST IF SHE COULD MOVE ME TO F-72, AND SHE SAID SHE COULDN'T BECAUSE IT WAS TOO LATE IN THE DAY. (I PICKED F-72 BECAUSE IT'S THE LAST CELL ON THE TIER, SO I COULD SEE IF SOMEONE WAS COMING TO ATTACK ME, AND HAVE TIME TO PREPARE TO DEFEND MYSELF). A COUPLE OF MINUTES LATER, I RETURNED AND ASKED C.O. II WEST IF SHE COULD MOVE ME TO ANOTHER SECTION. TAVON TOLD HER NOT TO MOVE ME, SO SHE SAID NO. REALISTICALLY, IT WASN'T NO WHERE TO GO BECAUSE THE BGF RUNS

THE WHOLE DETENTION CENTER.

6.) AT THIS POINT, IT WAS 3:00 PM, SO WE HAD TO LOCK IN FOR SHIFT CHANGE. WHILE LOCKED IN THE CELL, I BEGAN TO SCHEME ON HOW TO HIT TAYON AND GET MOVED OUT OF THE DETENTION CENTER. WHEN OUR CELL DOOR OPENED FOR DINNER FEED UP, I SENT MY CELL MATE DOWN TO G-SECTION TO SUMMON TAYON UNDER THE GUISE OF WANTING TO APOLOGIZE AND PAY HIM TO LEAVE ME ALONE. MY CELL MATE RETURNED AND SAID TAYON WAS SLEEP. A SHORT TIME LATER, THREE BGF MEMBERS FROM G-SECTION CAME DOWN TO F-SECTION AND STARTED HANGING OUT ON THE WEST BOTTOM TIER. I STAYED NEAR THE FRONT OF THE TIER AND KEPT MY HAND ON MY KNIFE.

7.) A COUPLE OF HOURS LATER, THE NURSE CAME AROUND GIVING OUT MEDICATION. WHILE SHE WAS GIVING OUT MEDICATION, SGT. TOMLINSON CAME PASS AND LOOKED UNTO THE TIER. WHEN SHE NOTICED THE BGF MEMBERS, SHE STOPPED AND ASKED WHAT THEY WERE DOING ON F-SECTION. ONE OF THEM LIED AND SAID HE SNUCK ONTO THE SECTION WHILE THE C.O. WAS DISTRACTED TALKING TO THE NURSE. SHE GAVE THEM A WARNING AND TOLD THEM TO LEAVE THE SECTION. AS THEY WALKED THRU THE GRILLE, SHE WALKED DOWN THE HALLWAY. (LATER THAT NIGHT, MY CELL MATE TOLD ME THEY WERE WAITING FOR THE NURSE TO LEAVE TO HIT ME, BECAUSE THEY COULD GET THE TOP GRILLE OPEN AND I WOULDN'T BE FOUND UNTIL ATLEAST COUNT TIME).

8.) AFTER THEY LEFT, I ASKED THE C.O. COULD I SPEAK TO HIM ABOUT AN URGENT SITUATION. HE TOLD ME TO WAIT UNTIL HE FINISHED MEDICATION. AS I AWAITED THE C.O., I RE-ASSESSED THE SITUATION TO DECIDE MY FUTURE COURSE OF ACTION. MY PRIORITY WAS TO GET MOVED FROM BALTIMORE CITY DETENTION CENTER (BCDC) WITHOUT BEING HARMED OR

HARMING NO ONE. BARRING THAT, I WAS GOING TO STAB TAYON WHITE. FAILING THAT, C.O. II WEST HAD TO BE DISCIPLINED.

9.) I CALLED C.O. I N. ABBAS AGAIN AND RECEIVED NO RESPONSE. SO I WENT IN THE CELL TO THINK. AS MY OPTIONS DWINDLED, I BEGAN TO CRY BECAUSE I DIDN'T LIKE WHAT IT WAS COMING DOWN TO. TAYON DOESN'T WAKE UP BEFORE 10:30-11:00 AM, AND WHATEVER IS GOING TO HAPPEN IS GOING DOWN BEFORE THEN. SO IT'S LOOKING LIKE I'M EITHER GOING TO GET STABBED OR I HAVE TO ASSAULT C.O. II WEST; AND I REALLY DIDN'T WANT TO ASSAULT C.O. II WEST.

10.) AFTER I FINISHED CRYING, I WENT TO CHECK THE PHONES TO SEE IF THEY WERE ON. FINDING THEM ON, I CALLED MY MOTHER AND TOLD MY MOTHER TO CALL THE ATTORNEY GENERAL TOMORROW AND TELL THEM I WAS INVOLVED IN AN ALTERCATION WITH CORRECTIONAL OFFICERS AND SHE WOULD LIKE THEM TO CHECK ON ME. AFTER I HUNG UP, I LOCKED IN THE CELL AND WENT TO SLEEP.

11.) ALL OF THE PRECEDING EVENTS OCCURRED ON JUNE 1, 2012. F-SECTION WAS SUPPOSED TO BE ON LOCKDOWN BECAUSE THE BGF STABBED A DETAINEE OVER 15 TIMES THE DAY BEFORE. BUT AS I SAID, THE BGF RUNS BLDC. (TAYON AND THOSE HIT MEN DO NOT SLEEP ON F-SECTION).

12.) I AWOKE AROUND 7:40 AM ON JUNE 2, 2012. SHORTLY THEREAFTER, MY DOOR OPENED FOR BREAKFAST FEED-UP. AFTER I GOT DRESSED, I GAVE MY KNIFE TO ONE OF MY FRIENDS, THEN I WENT INTO THE HALLWAY TO LOOK FOR C.O. II WEST. NOT SEEING HER, I WENT TO THE CART AND STARTED PASSING OUT TRAYS. AFTER I FINISHED I HAD TWO TRAYS LEFT, SO I RETURNED TO THE FOOD CART.

13.) UPON ENTERING THE HALLWAY, I SEE C.O. II WEST SITTING AT THE DESK WRITING IN THE LOG BOOK. SO I SAT THE TRAYS DOWN AND TURNED AROUND AND SLAPPED C.O. II WEST LIGHTLY WITH MY RIGHT HAND. I THOUGHT SHE WOULD GET UP AND RUN, BUT ALL SHE DID WAS LOOK AT ME LIKE SHE WAS SHOCKED. SO I BALLED UP MY LEFT HAND AND PUNCHED HER, KNOCKING HER OUT OF THE CHAIR AND ONTO THE FLOOR. I WALKED AROUND THE CHAIR AND PUNCHED HER AGAIN WITH MY LEFT HAND. AS I DREW BACK MY RIGHT HAND, I WAS TACKLED BY TWO MEMBERS OF THE BGF, WHO HELD ME ON THE FLOOR UNTIL C.O. II TERON KNIGHT GOT OUT HIS HANDCUFFS.

14.) AS C.O. II KNIGHT BEGAN TO HANDCUFF ME, A WOMAN CAME OUT OF MEDICAL. HE TOLD HER TO GO BACK IN THE HOSPITAL AND CALL A 10-13 ON F-SECTION ON THE RADIO. AS C.O. II KNIGHT PULLED ME TO MY FEET, A CROWD OF C.O.'S RAN TOWARD F-SECTION. SO HE WALKED ME TO THE POST 40 GRILLE AND ASKED WHERE TO TAKE ME.

15.) AS HE AWAITED INSTRUCTIONS, SGT. PORTER WALKED UP TO ME AND PLACED HIS RIGHT HAND AROUND MY WINDPIPE CHOKING ME AND STATED, "WHAT THE FUCK IS WRONG WITH YOU? HITTING A WOMAN!". I TRIED TO TUCK MY NECK INTO MY CHEST TO LOOSEN HIS GRIP BECAUSE I COULDN'T BREATHE, BUT IT WAS TO NO AVAIL. AFTER SGT. PORTER REMOVED HIS HAND, CAPT. HANCOCK PLACED HIS RIGHT AROUND MY WINDPIPE CHOKING ME, AND PUNCHED ME IN THE FACE WITH HIS LEFT HAND. AT THIS POINT, SOMEONE YELLED ABOUT THE CAMERAS ON THE OTHER SIDE OF THE POST 40 GRILLE.

16.) SGT. PORTER GRABBED ME BY THE ARM AND TOOK ME THRU POST 40 GRILLE AND AROUND THRU THE GRILLE AT THE ENTRANCE TO E-SECTION. HE BENT ME OVER AND RAN ME HEAD FIRST INTO THE BRICK WALL. AS I HIT

THE WALL, I FELL TO MY KNEES. JANE DOE #1, JANE DOE #2, JANE DOE #3 AND JOHN DOE #1 RAN UP TO ME AND BEGAN KICKING ME IN THE UPPER TORSO, HIP AREA AND PUNCHING ME. I CLOSED MY EYES AND YELLED THRU CLENCHED TEETH "I'M CALLING THE ATTORNEY GENERAL AND I'M PRESSING CHARGES." THEY SCREAMED "FUCK THE ATTORNEY GENERAL!" AS THEY CONTINUED THEIR ASSAULT ON ME. (WHILE BEING KICKED, MY HEAD / NECK AREA KEPT HITTING THE CORNER OF THE BRICK WALL).

17.) AFTER A COUPLE OF MINUTES, LT. LATIMER ORDERED THEM TO STOP ASSAULTING ME. AS I WAS BEING TAKEN DOWN THE STAIRS, JANE DOE #2 AND JANE DOE #3 YELLED "THROW HIS ASS DOWN THE STEPS." THE ESCORTING OFFICER STOPPED AT THE TOP OF THE STAIRS, AND LT. LATIMER SCREAMED "I SAID THAT'S ENOUGH. NOW TAKE HIM DOWNSTAIRS TO AN ISOLATION CELL." LT. LATIMER FOLLOWED US DOWNSTAIRS.

18.) ONCE IN THE ISOLATION CELL, I ASKED TO SPEAK TO I.U. AND STATED I WANTED TO PRESS CHARGES. ABOUT 20 MINUTES LATER, I WAS TAKEN UPSTAIRS TO BLOC HOSPITAL. MY RECORDED INJURIES WERE A 2 CM WOUND ON LEFT SIDE OF HEAD, PATEKIAL HEMORRAGING IN LEFT EYE, BLACKENED RIGHT EYE, BRUISED RIGHT HIP JOINT AND CONTUSIONS FROM MY LEFT SHOULDER TO RIB AREA. THESE WERE RECORDED ON PAPER.

19.) THE NURSE BEGAN TO PREP ME FOR SUTURES AND A TETANUS SHOT. INITIALLY I REFUSED BOTH, BUT AFTER SOME PRODDING FROM THE NURSE, I ACCEPTED THE TETANUS SHOT (I DIDN'T KNOW IF I COULD TAKE THE PAIN FROM THE SUTURES). THEY MADE ME SIGN A PAPER FOR REFUSING THE SUTURES. I WAS GIVEN 4 MOTRIN TO TAKE NOW AND SOME PILLS TO TAKE WHENEVER I FEEL PAIN. THE NURSE SCHEDULED ME FOR A FOLLOW-UP, AND

SAID I'D BE GETTING SOME PILLS FOR FIVE DAYS. AFTERWARDS I WAS TAKEN BACK TO THE ISOLATION CELL.

20.) UPON ARRIVAL BACK IN THE ISOLATION CELL, SGT. PORTER CAME AND APOLOGIZED TO ME FOR ASSAULTING ME. I TOLD HIM I WOULDN'T JEOPARDIZE HIS JOB BECAUSE HE IS A GOOD GUY WHO MADE A BAD DECISION (I EVEN WROTE A INMATE STATEMENT EXCULPATING PORTER), BUT SINCE NO ONE IS INTERESTED IN PURSUING JUSTICE ON MY BEHALF, I'M TELLING IT LIKE IT HAPPENED. WHILE WE WERE TALKING, BCDC'S I.U. AND AN F.A. ENTERED THE ISOLATION AREA, SO SGT. PORTER LEFT. I TOLD THEM WHAT HAPPENED, AND FOR INSURANCE TO ENSURE THAT I WAS MOVED FROM BCDC TO A SAFER ENVIRONMENT, I TOLD ON SOME C.O.'S TAYON WHITE WAS HAVING SEX WITH, AND THE RESULTS OF THEIR RECENT FEUD. THE F.A. CONFIRMED SOME OF WHAT I SAID, AND SHORTLY THEREAFTER I WAS TRANSFERRED TO MRDCC.

21.) THE NEXT MORNING (6-3-12) I AWOKE IN EXCRUCIATING PAIN - MY BODY ACHED, MY HEAD THROBBED, MY VISION BLURRED IN MY LEFT EYE AND MY FACE HURT IF I OPENED MY MOUTH TOO WIDE. I FILED SEVERAL SICK CALL SLIPS AND AN ARP ("MRDCC-DS32-12) TO GET MEDICAL TREATMENT (THERE WAS A TECHNICAL ERROR - I AM A PRE-TRIAL DETAINEE HOUSED IN A D.O.C. FACILITY AND THE NUMBER THEY GAVE ME WASN'T IN THE SYSTEM YET). I WAS PLACED ON A PAIN MANAGEMENT REGIMEN CONSISTING OF 600 MG OF IBUPROFEN AND 375 MG OF NAPROXEN TWICE A DAY (NAPROXEN IS THE STRONGEST PAIN MEDICINE THEY CAN GIVE) AND GIVEN A X-RAY OF MY LEFT SHOULDER (NEGATIVE). IT'S OVER 45 DAYS LATER AND I'M WAITING TO SEE THE EYE DOCTOR (MY VISION BLURS AND I GET A HEADACHE IF I READ OR WRITE FOR A PERIOD OF TIME) AND I CONTINUE TO HAVE CIRCULATION PROBLEMS IN MY LEFT ARM (I AM LEFT-HANDED). THE P.A. RECORDED MY

VISIBLE INJURIES IN D.O.C.'S MEDICAL COMPUTER.

22.) IN AN ATTEMPT TO COVER UP THE FACT THAT I WAS ASSAULTED WHILE HANDCUFFED, C.O. II KNIGHT FALSIFIED PART OF HIS INMATE RULE VIOLATION REPORT, WHERE HE STATED, "INMATE HEMPHILL BECAME AGGRESSIVE AND COMBATIVE WHEN HE AND ASSISTING OFFICERS ATTEMPTED TO SUBDUE HEMPHILL." HOWEVER, WHEN DETECTIVE CHRISTOPHER NICKEL CONFRONTED C.O. II KNIGHT WITH THE FACT THAT C.O. II WEST STATED THAT TWO DETAINEES ASSISTED C.O. II KNIGHT IN HANDCUFFING ME, HE HAD TO ADMIT THE TRUTH, AND HIS LIE WAS EXPOSED.

23.) ON JUNE 5, 2012, I WAS TAKEN TO CENTRAL BOOKING TO GET CHARGED FOR ASSAULTING C.O. II WEST. THE ATTENDANT INTAKE NURSE NOTED MY VISIBLE INJURIES IN CENTRAL BOOKING'S INTAKE MEDICAL COMPUTER, CHECKED MY RIGHT HIP AND GAVE ME SOME PAIN MEDICINE (THIS WAS BEFORE MY TREATMENT AT MRDC). SHORTLY THEREAFTER, I SAW BCDC CHIEF OF SECURITY SHAVELLA MILES, AND TURNED TO HER FOR HELP. I INFORMED HER THAT I WAS ASSAULTED BY HER OFFICERS WHILE HANDCUFFED, AND SHE COLDLY STATED, "I KNOW; AND THAT'S WHAT YOU GET. YOU SHOULDN'T HAVE ASSAULTED ONE OF MY OFFICERS." I WAS TAKEN ABACK BY HER ADMITTED COMPLICITY IN MY ASSAULT, AND IT WAS DULY NOTED BY MYSELF AND ANOTHER DETAINEE WHO WILL BE MY WITNESS AT TRIAL.

24.) I ALSO GAVE BCDC'S I.V. INFORMATION ON UNSOLVED BGF STABBINGS, STASH SPOTS AND C.O. MULES. SOMEHOW THE BGF FOUND OUT. SO NOW, THERE'S NOT ONLY A BGF HIT ON ME, BUT ALSO MONEY ON MY HEAD FOR SNITCHING.

DEFENDANTS

(ACTING IN THEIR OFFICIAL AND INDIVIDUAL CAPACITIES)

SHAYELLA MILES, BCDC CHIEF OF SECURITY, VIOLATED MY DUE PROCESS RIGHTS UNDER THE 5TH AND 14TH AMENDMENTS TO THE U.S. CONSTITUTION. HER CALLOUS AND DELIBERATE INDIFFERENCE TO THE SAFETY AND WELFARE OF PRE-TRIAL DETAINEES ENTRUSTED TO HER CARE, FOSTERED AN ENVIRONMENT WHERE CORRECTIONAL OFFICERS ARE CORRUPT (I KNOW MORE), AND HAVE A COMPLETE DISREGARD FOR THE RIGHTS AND SAFETY OF SAID DETAINEES.

CAPTAIN HANCOCK VIOLATED MY 8TH AMENDMENT RIGHT TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT, ALONG WITH MY 14TH AMENDMENT RIGHT TO DUE PROCESS IN HIS EXCESSIVE USE OF FORCE, BY ASSAULTING ME WHILE I WAS HANDCUFFED.

SARGENT PORTER VIOLATED MY 8TH AMENDMENT RIGHT TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT, ALONG WITH MY 14TH AMENDMENT RIGHT TO DUE PROCESS IN HIS EXCESSIVE USE OF FORCE, BY ASSAULTING ME WHILE I WAS HANDCUFFED.

C.O. II KWANITA WEST VIOLATED MY 14TH AMENDMENT RIGHT TO DUE PROCESS AND 8TH AMENDMENT RIGHT TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT IN DISPLAYING AN OBSCURATELY AND DELIBERATELY INDIFFERENT ATTITUDE TOWARDS MY WELL-BEING, BY GIVING THE BGF INFORMATION THAT COULD CAUSE ME GREAT HARM AND REFUSING TO MOVE ME OUT OF HARM'S WAY.

C.O. II TERON KNIGHT VIOLATED MY 8TH AMENDMENT RIGHT TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT, ALONG WITH MY 14TH AMENDMENT RIGHT TO DUE PROCESS BY FAILING TO INTERVENE WHEN OTHER OFFICERS

ATTACKED ME WHILE I WAS HANDCUFFED AND FALSIFYING A DISCIPLINARY REPORT IN AN ATTEMPT TO COVER UP THE ASSAULT.

JANE DOE #1 (I BELIEVE HER NAME IS C.O. II TUCKER) VIOLATED MY 8TH AMENDMENT RIGHT TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT, ALONG WITH MY 14TH AMENDMENT RIGHT TO DUE PROCESS IN HER EXCESSIVE USE OF FORCE, BY ASSAULTING ME WHILE I WAS HANDCUFFED.

JANE DOE #2 (MIGHT BE C.O. II EVANS) VIOLATED MY 8TH AMENDMENT RIGHT TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT, ALONG WITH MY 14TH AMENDMENT RIGHT TO DUE PROCESS IN HER EXCESSIVE USE OF FORCE, BY ASSAULTING ME WHILE I WAS HANDCUFFED.

JANE DOE #3 (LIGHT SKIN WITH SOME WEIGHT) VIOLATED MY 8TH AMENDMENT RIGHT TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT, ALONG WITH MY 14TH AMENDMENT RIGHT TO DUE PROCESS IN HER EXCESSIVE USE OF FORCE, BY ASSAULTING WHILE I WAS HANDCUFFED.

JOHN DOE #1 (ONLY HEARD VOICE) VIOLATED MY 8TH AMENDMENT RIGHT TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT, ALONG WITH MY 14TH AMENDMENT RIGHT TO DUE PROCESS IN HIS EXCESSIVE USE OF FORCE, BY ASSAULTING ME WHILE I WAS HANDCUFFED.

NOTE: I ONLY ATTEMPT TO IDENTIFY JANE DOE #1 AND #2 BECAUSE IT LOOKED LIKE THEY WERE STANDING BEHIND ME WHEN SGT. PORTER THREW ME INTO THE WALL. IF I HAVE MISIDENTIFIED THESE WOMEN, I APOLOGIZE IN ADVANCE FOR THE INCONVENIENCE.

COMPLAINT.

SIGNED THIS 29TH DAY OF JULY, 2012.

Calvin Hemphill

CALVIN HEMPHILL #404753

550 S. MADISON ST

BALTIMORE MD 21202